

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----X  
BRUCE RIGGS, Individually, and on Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

MASSACHUSETTS FINANCIAL SERVICES  
COMPANY, MFS INVESTMENT  
MANAGEMENT, SUN LIFE FINANCIAL, INC.,  
MFS SERIES TRUST I, MFS SERIES TRUST II,  
MFS SERIES TRUST III, MFS SERIES TRUST IV,  
MFS SERIES TRUST V, MFS SERIES TRUST VI,  
MFS SERIES TRUST VII, MFS SERIES TRUST  
VIII, MFS SERIES TRUST IX, MFS SERIES  
TRUST X, MFS SERIES TRUST XI, MFS  
CAPITAL OPPORTUNITIES FUND, MFS CORE  
GROWTH FUND, MFS LARGE CAP GROWTH  
FUND, MFS MANAGED SECTORS FUND, MFS  
MID CAP GROWTH FUND, MFS NEW  
DISCOVERY FUND, MFS NEW ENDEAVOR  
FUND, MFS RESEARCH FUND, MFS  
STRATEGIC GROWTH FUND, MFS  
TECHNOLOGY FUND, MASSACHUSETTS  
INVESTORS GROWTH STOCK, MFS MID CAP  
VALUE FUND, MFS RESEARCH GROWTH  
AND INCOME FUND, MFS TOTAL RETURN  
FUND, MFS UNION STANDARD EQUITY FUND,  
MFS UTILITIES FUND, MFS VALUE FUND,

Civ. No. 03 CV 12500 (WGY)

[Caption continued on next page]

**DECLARATION OF DAVID PASTOR IN SUPPORT OF THE MOTION OF ROBERT  
K. WILLMS FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND  
FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

MASSACHUSETTS INVESTORS TRUST, MFS :  
 AGGRESSIVE GROWTH ALLOCATION FUND, :  
 MFS CONSERVATIVE ALLOCATION FUND, :  
 MFS MODERATE ALLOCATION FUND, MFS :  
 BOND FUND, MFS EMERGING MARKETS :  
 DEBT FUND, MFS GOVERNMENTAL :  
 LIMITED MATURITY FUND, MFS :  
 GOVERNMENT MORTGAGE FUND, MFS :  
 GOVERNMENT SECURITIES FUND, MFS :  
 HIGH INCOME FUND, MFS HIGH YIELD :  
 OPPORTUNITIES FUND, BOND FUND, MFS :  
 LIMITED MATURITY FUND, MFS RESEARCH :  
 BOND FUND, MFS STRATEGIC INCOME FUND, :  
 MFS ALABAMA MUNICIPAL BOND FUND, :  
 MFS ARKANSAS MUNICIPAL BOND FUND, :  
 MFS CALIFORNIA MUNICIPAL BOND FUND, :  
 MFS FLORIDA MUNICIPAL BOND FUND, MFS :  
 GEORGIA MUNICIPAL BOND FUND, MFS :  
 MARYLAND MUNICIPAL BOND FUND, MFS :  
 MASSACHUSETTS MUNICIPAL BOND FUND, :  
 MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
 MFS MUNICIPAL BOND FUND, MFS :  
 MUNICIPAL LIMITED MATURITY FUND, :  
 MFS NEW YORK MUNICIPAL BOND FUND, :  
 MFS NORTH CAROLINA MUNICIPAL BOND :  
 FUND, MFS PENNSYLVANIA MUNICIPAL :  
 BOND FUND, MFS SOUTH CAROLINA :  
 MUNICIPAL BOND FUND, MFS TENNESSEE :  
 MUNICIPAL BOND FUND, MFS VIRGINIA :  
 MUNICIPAL BOND FUND, MFS WEST :  
 VIRGINIA MUNICIPAL BOND FUND, MFS :  
 EMERGING MARKETS EQUITY FUND, MFS :  
 GLOBAL EQUITY FUND, MFS GLOBAL :  
 GROWTH FUND, MFS GLOBAL TOTAL :  
 RETURN FUND, MFS INTERNATIONAL :  
 GROWTH FUND, MFS INTERNATIONAL :  
 NEW DISCOVERY FUND, MFS :  
 INTERNATIONAL VALUE FUND, MFS :  
 RESEARCH INTERNATIONAL FUND, MFS :  
 SERIES TRUST VII and ALL DEFENDANTS, :

Defendants. :

-----X  
[Additional Captions Set Forth Below]

-----X  
OLIVER S. TRONE, Individually, and on Behalf of  
All Others Similarly Situated,

Plaintiff,

vs.

Civ. No. 03 CV 12514 (WGY)

MFS CAPITAL OPPORTUNITIES FUND, MFS  
CORE GROWTH FUND, MFS LARGE CAP  
GROWTH FUND, MFS MANAGED SECTORS  
FUND, MFS MID CAP GROWTH FUND, MFS  
NEW DISCOVERY FUND, MFS NEW  
ENDEAVOR FUND, MFS RESEARCH FUND,  
MFS STRATEGIC GROWTH FUND, MFS  
TECHNOLOGY FUND, MASSACHUSETTS  
INVESTORS GROWTH STOCK, MFS MID CAP  
VALUE FUND, MFS RESEARCH GROWTH  
AND INCOME FUND, MFS TOTAL RETURN  
FUND, MFS UNION STANDARD EQUITY FUND,  
MFS UTILITIES FUND, MFS VALUE FUND,  
MASSACHUSETTS INVESTORS TRUST, MFS  
AGGRESSIVE GROWTH ALLOCATION FUND,  
MFS CONSERVATIVE ALLOCATION FUND,  
MFS MODERATE ALLOCATION FUND, MFS  
BOND FUND, MFS EMERGING MARKETS  
DEBT FUND, MFS GOVERNMENTAL  
LIMITED MATURITY FUND, MFS  
GOVERNMENT MORTGAGE FUND, MFS  
GOVERNMENT SECURITIES FUND, MFS  
HIGH INCOME FUND, MFS HIGH YIELD  
OPPORTUNITIES FUND, BOND FUND, MFS  
LIMITED MATURITY FUND, MFS RESEARCH  
BOND FUND, MFS STRATEGIC INCOME FUND,  
MFS ALABAMA MUNICIPAL BOND FUND,  
MFS ARKANSAS MUNICIPAL BOND FUND,  
MFS CALIFORNIA MUNICIPAL BOND FUND,  
MFS FLORIDA MUNICIPAL BOND FUND, MFS  
GEORGIA MUNICIPAL BOND FUND, MFS

MARYLAND MUNICIPAL BOND FUND, MFS :  
 MASSACHUSETTS MUNICIPAL BOND FUND, :  
 MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
 MFS MUNICIPAL BOND FUND, MFS :  
 MUNICIPAL LIMITED MATURITY FUND, :  
 MFS NEW YORK MUNICIPAL BOND FUND, :  
 MFS NORTH CAROLINA MUNICIPAL BOND :  
 FUND, MFS PENNSYLVANIA MUNICIPAL :  
 BOND FUND, MFS SOUTH CAROLINA :  
 MUNICIPAL BOND FUND, MFS TENNESSEE :  
 MUNICIPAL BOND FUND, MFS VIRGINIA :  
 MUNICIPAL BOND FUND, MFS WEST :  
 VIRGINIA MUNICIPAL BOND FUND, MFS :  
 EMERGING MARKETS EQUITY FUND, MFS :  
 GLOBAL EQUITY FUND, MFS GLOBAL :  
 GROWTH FUND, MFS GLOBAL TOTAL :  
 RETURN FUND, MFS INTERNATIONAL :  
 GROWTH FUND, MFS INTERNATIONAL :  
 NEW DISCOVERY FUND, MFS :  
 INTERNATIONAL VALUE FUND, MFS :  
 RESEARCH INTERNATIONAL FUND, MFS :  
 CASH RESERVE FUND, MFS GOVERNMENT :  
 MONEY MARKET FUND, MFS MONEY :  
 MARKET FUND, MFS MUNICIPAL SERIES :  
 TRUST, MFS SERIES TRUST I, MFS SERIES :  
 TRUST II, MFS SERIES TRUST III, MFS SERIES :  
 TRUST IV, MFS SERIES TRUST V, MFS SERIES :  
 TRUST VI, MFS SERIES TRUST VII, MFS SERIES :  
 TRUST VIII, MFS SERIES TRUST IX, MFS :  
 SERIES TRUST X, MFS SERIES TRUST XI, SUN :  
 LIFE FINANCIAL, INC., JOHN DOES 1-100, and :  
 ALL DEFENDANTS, :

Defendants. :

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DANIELLE ADAMS and  
DEAN DELLAVENTURA, Individually, and on  
Behalf of All Others Similarly Situated,

Plaintiff,

Civ. No. 03 CV 12536 (WGY)

vs.

MFS CAPITAL OPPORTUNITIES FUND, MFS  
CORE GROWTH FUND, MFS LARGE CAP  
GROWTH FUND, MFS MANAGED SECTORS  
FUND, MFS MID CAP GROWTH FUND, MFS  
NEW DISCOVERY FUND, MFS NEW  
ENDEAVOR FUND, MFS RESEARCH FUND,  
MFS STRATEGIC GROWTH FUND, MFS  
TECHNOLOGY FUND, MASSACHUSETTS  
INVESTORS GROWTH STOCK, MFS MID CAP  
VALUE FUND, MFS RESEARCH GROWTH  
AND INCOME FUND, MFS TOTAL RETURN  
FUND, MFS UNION STANDARD EQUITY FUND,  
MFS UTILITIES FUND, MFS VALUE FUND,  
MASSACHUSETTS INVESTORS TRUST, MFS  
AGGRESSIVE GROWTH ALLOCATION FUND,  
MFS CONSERVATIVE ALLOCATION FUND,  
MFS MODERATE ALLOCATION FUND, MFS  
BOND FUND, MFS EMERGING MARKETS  
DEBT FUND, MFS GOVERNMENTAL  
LIMITED MATURITY FUND, MFS  
GOVERNMENT MORTGAGE FUND, MFS  
GOVERNMENT SECURITIES FUND, MFS  
HIGH INCOME FUND, MFS HIGH YIELD  
OPPORTUNITIES FUND, BOND FUND, MFS  
LIMITED MATURITY FUND, MFS RESEARCH  
BOND FUND, MFS STRATEGIC INCOME FUND,  
MFS ALABAMA MUNICIPAL BOND FUND,  
MFS ARKANSAS MUNICIPAL BOND FUND,  
MFS CALIFORNIA MUNICIPAL BOND FUND,  
MFS FLORIDA MUNICIPAL BOND FUND, MFS  
GEORGIA MUNICIPAL BOND FUND, MFS

MARYLAND MUNICIPAL BOND FUND, MFS :  
 MASSACHUSETTS MUNICIPAL BOND FUND, :  
 MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
 MFS MUNICIPAL BOND FUND, MFS :  
 MUNICIPAL LIMITED MATURITY FUND, :  
 MFS NEW YORK MUNICIPAL BOND FUND, :  
 MFS NORTH CAROLINA MUNICIPAL BOND :  
 FUND, MFS PENNSYLVANIA MUNICIPAL :  
 BOND FUND, MFS SOUTH CAROLINA :  
 MUNICIPAL BOND FUND, MFS TENNESSEE :  
 MUNICIPAL BOND FUND, MFS VIRGINIA :  
 MUNICIPAL BOND FUND, MFS WEST :  
 VIRGINIA MUNICIPAL BOND FUND, MFS :  
 EMERGING MARKETS EQUITY FUND, MFS :  
 GLOBAL EQUITY FUND, MFS GLOBAL :  
 GROWTH FUND, MFS GLOBAL TOTAL :  
 RETURN FUND, MFS INTERNATIONAL :  
 GROWTH FUND, MFS INTERNATIONAL :  
 NEW DISCOVERY FUND, MFS :  
 INTERNATIONAL VALUE FUND, MFS :  
 RESEARCH INTERNATIONAL FUND, MFS :  
 CASH RESERVE FUND, MFS GOVERNMENT :  
 MONEY MARKET FUND, MFS MONEY :  
 MARKET FUND, MFS MUNICIPAL SERIES :  
 TRUST, MFS SERIES TRUST I, MFS SERIES :  
 TRUST II, MFS SERIES TRUST III, MFS SERIES :  
 TRUST IV, MFS SERIES TRUST V, MFS SERIES :  
 TRUST VI, MFS SERIES TRUST VII, MFS SERIES :  
 TRUST VIII, MFS SERIES TRUST IX, MFS :  
 SERIES TRUST X, MFS SERIES TRUST XI, SUN :  
 LIFE FINANCIAL, INC., MASSACHUSETTS :  
 FINANCIAL SERVICES COMPANY DBA MFS :  
 INVESTMENT MANAGEMENT, and JOHN DOES :  
 1-100 :

Defendants. :

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STEVEN GREENBERG, on Behalf of Himself and :  
All Others Similarly Situated, :  
 : Civ. No. 03 CV 12545 (WGY)  
Plaintiff, :  
 :  
vs. :  
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MASSACHUSETTS FINANCIAL SERVICES :  
COMPANY, MFS SERIES TRUST I, MFS SERIES :  
TRUST II, MFS SERIES TRUST III, MFS SERIES :  
TRUST IV, MFS SERIES TRUST V, MFS SERIES :  
TRUST VI, MFS SERIES TRUST VII, MFS SERIES :  
TRUST VIII, MFS SERIES TRUST IX, MFS :  
SERIES TRUST X, and MFS SERIES TRUST XI, :  
 :  
Defendants. :  
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-----X

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JACOB ELEPHANT, on Behalf of Himself and :  
All Others Similarly Situated, :  
:  
Plaintiff, : Civ. No. 03 CV 12570 (WGY)  
:  
vs. :  
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MASSACHUSETTS FINANCIAL SERVICES :  
COMPANY, MFS INVESTMENT :  
MANAGEMENT, SUN LIFE FINANCIAL, INC., :  
MFS SERIES TRUST I, MFS SERIES TRUST II, :  
MFS SERIES TRUST III, MFS SERIES TRUST IV, :  
MFS SERIES TRUST V, MFS SERIES TRUST VI, :  
MFS SERIES TRUST VII, MFS SERIES TRUST :  
VIII, MFS SERIES TRUST IX, MFS SERIES :  
TRUST X, MFS SERIES TRUST XI, MFS :  
CAPITAL OPPORTUNITIES FUND, MFS CORE :  
GROWTH FUND, MFS LARGE CAP GROWTH :  
FUND, MFS MANAGED SECTORS FUND, MFS :  
MID CAP GROWTH FUND, MFS NEW :  
DISCOVERY FUND, MFS NEW ENDEAVOR :  
FUND, MFS RESEARCH FUND, MFS :  
STRATEGIC GROWTH FUND, MFS :  
TECHNOLOGY FUND, MASSACHUSETTS :  
INVESTORS GROWTH STOCK, MFS MID CAP :  
VALUE FUND, MFS RESEARCH GROWTH :  
AND INCOME FUND, MFS TOTAL RETURN :  
FUND, MFS UNION STANDARD EQUITY FUND, :  
MFS UTILITIES FUND, MFS VALUE FUND, :  
MASSACHUSETTS INVESTORS TRUST, MFS :  
AGGRESSIVE GROWTH ALLOCATION FUND, :  
MFS CONSERVATIVE ALLOCATION FUND, :  
MFS MODERATE ALLOCATION FUND, MFS :  
BOND FUND, MFS EMERGING MARKETS :  
DEBT FUND, MFS GOVERNMENTAL :  
LIMITED MATURITY FUND, MFS :  
GOVERNMENT MORTGAGE FUND, MFS :  
GOVERNMENT SECURITIES FUND, MFS :  
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HIGH INCOME FUND, MFS HIGH YIELD  
 OPPORTUNITIES FUND, BOND FUND, MFS  
 LIMITED MATURITY FUND, MFS RESEARCH  
 BOND FUND, MFS STRATEGIC INCOME FUND,  
 MFS ALABAMA MUNICIPAL BOND FUND,  
 MFS ARKANSAS MUNICIPAL BOND FUND,  
 MFS CALIFORNIA MUNICIPAL BOND FUND,  
 MFS FLORIDA MUNICIPAL BOND FUND, MFS  
 GEORGIA MUNICIPAL BOND FUND, MFS  
 MARYLAND MUNICIPAL BOND FUND, MFS  
 MASSACHUSETTS MUNICIPAL BOND FUND,  
 MFS MISSISSIPPI MUNICIPAL BOND FUND,  
 MFS MUNICIPAL BOND FUND, MFS  
 MUNICIPAL LIMITED MATURITY FUND,  
 MFS NEW YORK MUNICIPAL BOND FUND,  
 MFS NORTH CAROLINA MUNICIPAL BOND  
 FUND, MFS PENNSYLVANIA MUNICIPAL  
 BOND FUND, MFS SOUTH CAROLINA  
 MUNICIPAL BOND FUND, MFS TENNESSEE  
 MUNICIPAL BOND FUND, MFS VIRGINIA  
 MUNICIPAL BOND FUND, MFS WEST  
 VIRGINIA MUNICIPAL BOND FUND, MFS  
 EMERGING MARKETS EQUITY FUND, MFS  
 GLOBAL EQUITY FUND, MFS GLOBAL  
 GROWTH FUND, MFS GLOBAL TOTAL  
 RETURN FUND, MFS INTERNATIONAL  
 GROWTH FUND, MFS INTERNATIONAL  
 NEW DISCOVERY FUND, MFS  
 INTERNATIONAL VALUE FUND, MFS  
 RESEARCH INTERNATIONAL FUND, JOHN  
 DOES 1-100, and MFS FUNDS

Defendants.

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YAKOV BURSTEIN, Individually and on Behalf of :  
All Others Similarly Situated, :  
:  
Plaintiff, : Civ. No. 03 CV 12622 (WGY)  
:  
vs. :  
:  
MFS GLOBAL TELECOMMUNICATIONS FUND, :  
CAPITAL OPPORTUNITIES FUND, MFS CORE :  
GROWTH FUND, MFS LARGE CAP GROWTH :  
FUND, MFS MANAGED SECTORS FUND, MFS :  
MID CAP GROWTH FUND, MFS NEW :  
DISCOVERY FUND, MFS NEW ENDEAVOR :  
FUND, MFS RESEARCH FUND, MFS :  
STRATEGIC GROWTH FUND, MFS :  
TECHNOLOGY FUND, MASSACHUSETTS :  
INVESTORS GROWTH STOCK, MFS MID CAP :  
VALUE FUND, MFS RESEARCH GROWTH :  
AND INCOME FUND, MFS TOTAL RETURN :  
FUND, MFS UNION STANDARD EQUITY FUND, :  
MFS UTILITIES FUND, MFS VALUE FUND, :  
MASSACHUSETTS INVESTORS TRUST, MFS :  
AGGRESSIVE GROWTH ALLOCATION FUND, :  
MFS CONSERVATIVE ALLOCATION FUND, :  
MFS MODERATE ALLOCATION FUND, MFS :  
BOND FUND, MFS EMERGING MARKETS :  
DEBT FUND, MFS GOVERNMENTAL :  
LIMITED MATURITY FUND, MFS :  
GOVERNMENT MORTGAGE FUND, MFS :  
GOVERNMENT SECURITIES FUND, MFS :  
HIGH INCOME FUND, MFS HIGH YIELD :  
OPPORTUNITIES FUND, BOND FUND, MFS :  
LIMITED MATURITY FUND, MFS RESEARCH :  
BOND FUND, MFS STRATEGIC INCOME FUND, :  
MFS ALABAMA MUNICIPAL BOND FUND, :  
MFS ARKANSAS MUNICIPAL BOND FUND, :  
MFS CALIFORNIA MUNICIPAL BOND FUND, :

MFS FLORIDA MUNICIPAL BOND FUND, MFS :  
 GEORGIA MUNICIPAL BOND FUND, MFS :  
 MARYLAND MUNICIPAL BOND FUND, MFS :  
 MASSACHUSETTS MUNICIPAL BOND FUND, :  
 MFS MISSISSIPPI MUNICIPAL BOND FUND, :  
 MFS MUNICIPAL BOND FUND, MFS :  
 MUNICIPAL LIMITED MATURITY FUND, :  
 MFS NEW YORK MUNICIPAL BOND FUND, :  
 MFS NORTH CAROLINA MUNICIPAL BOND :  
 FUND, MFS PENNSYLVANIA MUNICIPAL :  
 BOND FUND, MFS SOUTH CAROLINA :  
 MUNICIPAL BOND FUND, MFS TENNESSEE :  
 MUNICIPAL BOND FUND, MFS VIRGINIA :  
 MUNICIPAL BOND FUND, MFS WEST :  
 VIRGINIA MUNICIPAL BOND FUND, MFS :  
 EMERGING MARKETS EQUITY FUND, MFS :  
 GLOBAL EQUITY FUND, MFS GLOBAL :  
 GROWTH FUND, MFS GLOBAL TOTAL :  
 RETURN FUND, MFS INTERNATIONAL :  
 GROWTH FUND, MFS INTERNATIONAL :  
 NEW DISCOVERY FUND, MFS :  
 INTERNATIONAL VALUE FUND, MFS :  
 RESEARCH INTERNATIONAL FUND, MFS :  
 CASH RESERVE FUND, MFS GOVERNMENT :  
 MONEY MARKET FUND, MFS :  
 GOVERNMENT MONEY MARKET FUND, MFS :  
 FUNDS, MFS MUNICIPAL SERIES TRUST, :  
 MFS SERIES TRUST I, MFS SERIES TRUST II, :  
 MFS SERIES TRUST III, MFS SERIES TRUST IV, :  
 MFS SERIES TRUST V, MFS SERIES TRUST VII, :  
 MFS SERIES TRUST VIII, MFS SERIES TRUST :  
 IX, MFS SERIES TRUST X, MFS SERIES TRUST :  
 XI, MFS FUND REGISTRANTS, SUN LIFE :  
 FINANCIAL, INC., MASSACHUSETTS :  
 FINANCIAL SERVICES COMPANY DBA MFS :  
 INVESTMENT MANAGEMENT, JOHN DOES :  
 1-100, MFS and SERIES TRUST VI, :  
 :  
 :

Defendants.

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David Pastor, declares, under penalty of perjury:

1. I am a member of Gilman and Pastor, LLP. I submit this Declaration in support of the motion of Robert K. Willms for consolidation, appointment as Lead Plaintiff and for approval of selection of Lead and Liaison Counsel.

2. Attached hereto as Exhibit A is a true and accurate copy of the notice published by plaintiff in the action entitled Bruce Riggs v. Massachusetts Financial Services Company, et al., 03-cv-12500 (WGY) (the "Riggs Action") on PR Newswire, a national, business-oriented newswire service, on December 11, 2003.

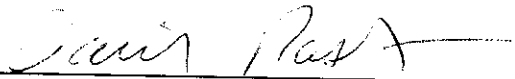
3. Attached hereto as Exhibit B is a true and accurate copy of a chart presenting the transactions in the subject securities of Robert K. Willms.

4. Attached hereto as Exhibit C is the certification of Robert K. Willms.

5. Attached hereto as Exhibit D is a true copy of the firm resume of Cauley Geller Bowman & Rudman LLP.

6. Attached hereto as Exhibit E is a true copy of the firm resume of Gilman and Pastor, LLP.

Dated: February 9, 2004

  
David Pastor